



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

MEMORANDUM

DATE: September 18, 1981
TO: Engineering Division Technical Personnel
FROM: Sanford M. Weiss, Director of Engineering /s/ SMW
SUBJECT: Removal of Permitted Equipment

At present, the District does not have a "banking rule". Several companies have desired to be able to bank their emissions but because of the lack of a rule, there is no adequate format to perform this function. There have been several innovative solutions found by various engineers to this problem. Some companies "banked" their emissions by adding them to the New Source Review file. Other engineers have told the companies to continue paying their annual permit fees even though their equipment may have been removed. By this method they would continue to keep their permits active; hence, be able to use the emissions for offset purposes. There also may be other solutions to the non-banking problem, of which I am not immediately aware of, that may have some validity.

If you have suggested to a company that they maintain their permits by continuing to pay their annual permit fees, please write me a very short memorandum indicating the company name and the permits involved. Also, if you have any innovative ideas which you are presently using to keep track of "banked" emissions, again please write me a very short memorandum about your method.

JFN: tc